

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

January 4 20 23  
Ravi Subramanian, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARK LEONETTI,

Defendant.

NO **CR23-5001** DGE

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**(Interstate Threat)**

On or about September 2, 2022, in Cowlitz County, within the Western District of Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate and foreign commerce, from the State of Washington to another state, for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, a communication, that is, a voicemail that contained the following threat to injure U.S.

Representative 1:

"I'm going to murder you f\*\*\*\*\* for going the wrong way on Rochester with whatever Rochester f\*\*\*\*\* you're with."

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 2**

**(Interstate Threat)**

On or about September 23, 2022, in Cowlitz County, within the Western District of Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate and foreign commerce, from the State of Washington to another state, for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, a communication, that is, a voicemail that contained the following threat to injure U.S.

Senator 1:

“Well, so I’m gonna murder you. It is justified.”

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 3**

**(Interstate Threat)**

On or about September 23, 2022, in Cowlitz County, within the Western District of Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate and foreign commerce, from the State of Washington to another state, for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, a communication, that is, a voicemail that contained the following threat to injure U.S.

Senator 1:

“Stupid dead whore. You called the locals. You called. Okay. Wasn’t [U.S. House Representative 1], [U.S. House Representative 1] did? Too bad it wasn’t you. We’d have followed you. We’d have followed them right back to Minnesota. ... Are you sure it wasn’t you? Please be you bitch. Please be. You stupid Jew meat bitch. ... Please have been you [U.S. Senator 1]. ... So I hope it was you. Bye-bye, adios if it was. And I bet you delicious g\*\*\* meat.”

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 4**

**(Interstate Threat)**

On or about September 23, 2022, in Cowlitz County, within the Western District of Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate and foreign commerce, from the State of Washington to another state, for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, a communication, that is, a voicemail that contained the following threat to injure U.S. Senator 1:

“Now even if you are delusional when we murder you, you don’t have to sober up to that. We’re just gonna murder you here bitch. The barbecue. Go ahead. You already been delusional all this much of your life, right? But when we barbecue you, maybe you will have been too. Maybe it makes you sushi.”

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 5**

**(Interstate Threat)**

On or about October 19, 2022, in Cowlitz County, within the Western District of Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate and foreign commerce, from the State of Washington to another state, for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, a communication, that is, a voicemail that contained the following threat to injure U.S. Senator 2:

“And what do we do to you with you there? ... We peel you, inside out, it’s called a ... Fort Vancouver lollipop, and you eat the meat off the inside, and they can come and fart and piss and shit on itself, all over its face, at the same time, right?”

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 6**

**(Interstate Threat)**

On or about October 26, 2022, in Cowlitz County, within the Western District of Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate and foreign commerce, from the State of Washington to another state, for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, a communication, that is, a voicemail that contained the following threat to injure U.S. Representative 2:

“Jew mouth. Jew blood. We need to get you back to Israel so we can kill you there.”

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 7**

**(Interstate Threat)**

On or about October 26, 2022, in Cowlitz County, within the Western District of Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate and foreign commerce, from the State of Washington to another state, for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, a communication, that is, a voicemail that contained the following threat to injure U.S. Representative 2:

“So Leonettis have always killed [U.S. Representative 2’s last name]s before, and it has never had anything to do with the Holocaust. ... Since before the Holocaust, Leonettis have always killed [U.S. Representative 2’s last name]s and Schulzes. That’s why it’s not déjà vu for you now, either maybe, f\*\*\*\*\*.”

All in violation of Title 18, United States Code, Section 875(c).

**FORFEITURE ALLEGATION**

The allegations contained in Counts 1-7 above are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of any of the offenses alleged in Counts 1-7, MARK LEONETTI shall forfeit to the United States any property constituting, or derived from, proceeds Defendant obtained as a result of the offense. All such property is forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), by way of Title 28, United States Code, Section 2461(c).

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
2 any act or omission of the defendant,

- 3 a. cannot be located upon the exercise of due diligence;  
4 b. has been transferred or sold to, or deposited with, a third party;  
5 c. has been placed beyond the jurisdiction of the Court;  
6 d. has been substantially diminished in value; or,  
7 e. has been commingled with other property which cannot be divided  
8 without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the  
10 defendant, up to the value of the above-described forfeitable property, pursuant to  
11 Title 21, United States Code, Section 853(p).

12 A TRUE BILL:

13  
14 DATED: 1/4/2023

15 *Signature of Foreperson redacted pursuant*  
16 *to the policy of the Judicial Conference of*  
17 *the United States.*

18 \_\_\_\_\_  
19 FOREPERSON

20   
21 \_\_\_\_\_  
22 NICHOLAS W. BROWN  
23 United States Attorney

24   
25 \_\_\_\_\_  
26 TODD GREENBERG  
Assistant United States Attorney

27   
28 \_\_\_\_\_  
29 WILLIAM DREHER  
30 Assistant United States Attorney